

# **Exhibit A**

Trial Week	Communication Date	Communication Time	Defense Communication	Government Communication	Witness Order	Exhibit List	Category
Week 1	5/18/2024	10:58 AM			Erin McNamara, Louie Bonsukan, [REDACTED], Le Zhou, Shamel Medrano	[Combined exhibit list]	Weekly Witness List; Weekly GX List
Week 1	5/23/2024	12:35 PM		The stamped versions of the exhibits the government intends to offer this week have been uploaded			GX - Reproduction
Week 2	5/25/2024	4:31 PM		The Government is uploading additional and updated exhibits			GX - New; GX - Reproduction
Week 2	5/25/2024	5:58 PM	The exhibits that were just made available to us do not have exhibit stickers. Continuing to provide initial versions of the government's exhibits without stickers and sending versions with stickers an indeterminate amount of time later is problematically inefficient. This process is unfairly burdensome for the defense to negotiate while the trial is going on. It requires the trial team to expend resources on matching up and re-organizing documents during trial, when the correct versions of the exhibits should have already been provided.				Defense Request - GX
Week 2	5/25/2024	10:51 AM		Below is the Government's expected witness list for the week of 5/28-5/31, which is subject to revision. Consistent with the Court's ruling, we are disclosing our witnesses before noon each Saturday. [...] We will follow up with the list of corresponding GX later today.	[REDACTED], Le Zhou, Shamel Medrano, Karin Maistrello, Haitham Khaled, Patrick Chin, Alex Gale (FBI), Steele Schottenheimer, Kim Espinoza (FBI), Susan Pecaro and/or Nicholas Timmons (SEC), Minran Wu, Jamie Wilson		Weekly Witness List; Weekly GX List
Week 2	5/26/2024	12:17 AM		In addition to exhibits that we listed in last week's email, listed below are exhibits that the Government may seek to offer this week.		[Combined exhibit list]	Weekly GX List
Week 3	6/1/2024	11:07 AM		The Government writes to provide its witness order for the upcoming week. [...] The Government has previously provided the defense the exhibits it anticipates admitting through Mr. Medrano and Mr. Khaled. It will provide any additional exhibits and exhibits for the other witnesses once assembled.	The Government's first witness will be Shamel Medrano. After Mr. Medrano, the Government anticipates calling Jenny Li, [REDACTED], Ya Li, Lonny Soza, Jammy Tam, and Haitham Khaled. However, the order of witnesses after Mr. Medrano may shift depending upon the length of cross-examinations and to accommodate scheduling needs of witnesses.		Weekly Witness List
Week 3	6/2/2024	11:20 AM		Additional discovery material dated June 2, 2024 has been uploaded below. [...] Additionally, we have uploaded additional government exhibits.			Production; GX - New
Week 3	6/2/2024	3:34 PM	We appreciate that the government may still be assembling its exhibits for the week, but it is now past 3pm on Sunday. Please immediately identify any documents the government intends to use tomorrow. We do have the documents to be used in Mr. Medrano's examination, but we understand that other witnesses may testify tomorrow.				Defense Request - GX
Week 3	6/2/2024	6:29 PM				[Weber exhibit list]	Single Witness GX List
Week 3	6/2/2024	6:33 PM	The witness list we have for this week begins with: Shamel Medrano, Jenny Li, [REDACTED]. Will you please provide a list of the exhibits the government intends to show Ms. Li?				Defense Request - GX
Week 3	6/2/2024	7:06 PM		[REDACTED] is likely before Jenny Li. We'll send her exhibits soon. There aren't too many.	[REDACTED] Jenny Li		Witness Update

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Week 3	6/2/2024	10:34 PM	I'm following up on Ms. Li's exhibits, as we understand there is still a chance she will be testifying tomorrow.				Defense Request - GX
Week 3	6/3/2024	12:10 AM		GXVH-3 through GXVH-6, which will be provided tonight		[Jenny Li exhibit list, including exhibits not yet provided]	Single Witness GX List
Week 3	6/3/2024	12:29 AM		Additional and updated government exhibits have been uploaded			GX - New; GX - Reproduction
Week 3	6/3/2024	3:09 PM		Tomorrow, after Mr. Medrano, the Government will call either Jenny Li or [REDACTED]. The Government may also call Margaret Murphy (Sherry Search Agent) and Liam Brennan (witness Guo arrest).	Medrano, Jenny Li or [REDACTED] Margaret Murphy, Liam Brennan	[Murphy exhibit list]	Single Witness GX List; Witness Update
Week 3	6/3/2024	3:48 PM	Thanks, does this list supplement the list from this weekend? In other words, should we expect the weekend's list to pick up again after Murphy and Brennan?				Defense Request - Witness Order
Week 3	6/3/2024	3:57 PM		Yes, that is our expectation. We'll see where we are at lunch and can provide additional information then.			
Week 3	6/4/2024	1:43 PM		Below are exhibits we presently may seek to offer into evidence tomorrow. We will send updates if needed.		[Mulan exhibit list]	Single Witness GX List
Week 3	6/4/2024	1:46 AM	Through which witness(es)?				Defense Request - Witness Order
Week 3	6/6/2024	8:35 AM		For Soza the Government intends to introduce the following exhibits. Please let us know if you have any objections. We expect Soza to testify tomorrow.	Soza	[Soza exhibit list]	Single Witness GX List
Week 4	6/8/2024	11:26 AM		After the completion of Special Agent Murphy's testimony, the Government intends to call the following witnesses: Giacomo Mattioli, [REDACTED], Haitham Khaled, Kimberly Espinoza (re: summary of records pertaining to the purchase of 675 Ramapo Valley Road), [REDACTED], Samuel Roberts, Bo Collins, Jamie Wilson. Please note the order of Roberts and Collins may switch pending travel and logistical issues.	Murphy, Giacomo Mattioli, [REDACTED], Haitham Khaled, Kimberly Espinoza, [REDACTED], Samuel Roberts or Bo Collins, Collins or Roberts, Jamie Wilson		Weekly Witness List; Weekly GX List
Week 4	6/8/2024	4:04 PM		As an update, the Government no longer intends to call [REDACTED]. Accordingly, after Mr. Mattioli, the Government intends to call Mr. Khaled.	Mattioli, Khaled		Witness Update
Week 4	6/9/2024	4:38 PM		Below is a list of exhibits the Government may seek to offer during Haitham Khaled's testimony. GX that had not previously been identified as potential Haitham Khaled exhibits are indicated in blue text.		[Khaled exhibit list, including exhibits not yet provided]	Single Witness GX List
Week 4	6/9/2024	5:04 PM		Espinoza will be putting into evidence a summary of flow of funds from Crane to the Mahwah Mansion. The attached is a high-level overview, which has previously been produced. We'll provide a draft of her summary analysis later today. Given the length of Khaled we anticipate she will testify late Tuesday or Wednesday.		[Espinoza II exhibit]	Single Witness GX List
Week 4	6/9/2024	6:13 PM	We have not received GXBR1508 through 1519. Please provide them.				Defense Request - GX
Week 4	6/9/2024	6:16 PM				[Mattioli exhibit list]	Single Witness GX List
Week 4	6/9/2024	6:20 PM		Government Exhibits GXBR1508 through 1519 are available through the following USAfx link			GX - New
Week 4	6/9/2024	11:18 PM		We have reproduced a set of exhibits that may be used during the direct examination of Mr. Khaled			GX - Reproduction

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Week 4	6/10/2024	10:56 AM		We no longer expect to call [REDACTED] this week. Depending on this week's pace and witness availability, the Government may call Minran Wu after Ms. Espinoza	Espinoza, Minran Wu		Witness Update
Week 4	6/10/2024	1:36 PM	Can you please confirm the list of exhibits you intend to offer during the testimony of Kimberly Espinoza and Minran Wu?				Defense Request - GX
Week 4	6/10/2024	5:48 PM				[Wu exhibit list]	Single Witness GX List
Week 4	6/10/2024	8:58 PM		Below is an additional discovery production. Please note that this material appears to be duplicative			Production
Week 4	6/12/2024	6:19 PM	Can you please confirm the complete list of exhibits you intend to offer during the testimony of Wilson and Roberts?				Defense Request - GX
Week 4	6/12/2024	8:50 PM				[Wilson exhibit list]	Single Witness GX List
Week 4	6/12/2024	9:13 PM				[Roberts exhibit list]	Single Witness GX List
Week 4	6/12/2024	9:46 PM		An additional discovery production has been uploaded below.			Production
Week 4	6/13/2024	12:11 PM		Espinoza was planning to be off tomorrow so we're going to call her after Wu. We expect her direct to be short. Then will be Wilson.	Wu, Espinoza, Wilson		Witness Update
Week 4	6/14/2024	5:00 PM		Collins exhibits for tomm are the GXMER series 2-13, 128, 1201-13		[Collins exhibit list]	Single Witness GX List

Witness	GX List Received	Beginning of Direct	Notice (Days)
Erin McNamara*	Saturday, May 18, 2024	Friday, May 24, 2024	6
Louie Bonsukan*	Saturday, May 18, 2024	Friday, May 24, 2024	6
Le Zhou*	Saturday, May 18, 2024	Tuesday, May 28, 2024	10
Karin Maistrello*	Sunday, May 26, 2024	Wednesday, May 29, 2024	3
Patrick Chin*	Sunday, May 26, 2024	Thursday, May 30, 2024	4
Steele Schottenheimer*	Sunday, May 26, 2024	Thursday, May 30, 2024	4
Kimberly Espinoza (I)*	Sunday, May 26, 2024	Friday, May 31, 2024	5
Shamel Medrano *	Sunday, May 26, 2024	Monday, June 3, 2024	8
<b>Jenny Li</b>	Monday, June 3, 2024	Tuesday, June 4, 2024	1
Ya Li	Tuesday, June 4, 2024	Wednesday, June 5, 2024	1
Lonny Soza	Thursday, June 6, 2024	Friday, June 7, 2024	1
Margaret Murphy	Monday, June 3, 2024	Friday, June 7, 2024	4
Giacomo Mattioli	Sunday, June 9, 2024	Monday, June 10, 2024	1
Haitham Khaled**	Sunday, June 9, 2024	Monday, June 10, 2024	1
<b>Minran Wu**</b>	Monday, June 10, 2024	Wednesday, June 12, 2024	2
<b>Jamie Wilson</b>	Wednesday, June 12, 2024	Thursday, June 13, 2024	1
<b>Espinoza (II)</b>	Sunday, June 9, 2024	Thursday, June 13, 2024	4
Bo Collins	Thursday, June 13, 2024	Friday, June 14, 2024	1

\* Exhibits identified in combined list

\*\* Initially combined list, followed by updated individual list after witness order change

Bold = GX list received after defense request